

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

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SAGUN TULI, M.D.,

Plaintiff,

v.

BRIGHAM & WOMEN'S HOSPITAL, INC.,  
ARTHUR DAY, M.D.

Defendants.

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) CA No. 1:07-cv-12338-NG  
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**PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION IN LIMINE TO  
PRECLUDE TESTIMONY OF CHRISTINE WALDRON**

Defendants, Brigham & Women's Hospital ("BWH") and Arthur Day, M.D., seek to preclude the testimony of Christine Waldron, a patient care coordinator at BWH. As Ms. Waldron has interacted with Dr. Tuli in connection with responding to patient complaints, and BWH relies on patient complaints as the basis for referring Dr. Tuli to PHS, her testimony is relevant. In addition, Ms. Waldron is a percipient witness of Dr. Tuli's interactions with staff and her emotional distress.

For the foregoing reasons, Plaintiff respectfully requests that this Court deny Defendants' motion *in limine* to preclude the testimony of Christine Waldron.

Respectfully submitted,

**Sagun Tuli, M.D.,**

By her attorneys,

/s/Camille V. Gerwin  
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Dated: January 8, 2009

**CERTIFICATE OF SERVICE**

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/s/Camille V. Gerwin  
Camille V. Gerwin